

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Chengxuan Han,

Defendant.

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Case: 2:25-cr-20479

Assigned To : Leitman, Matthew F.

Referral Judge: Grand, David R.

Assign. Date : 6/26/2025

Description: INFO USA V. HAN (AB)

Violations:

18 U.S.C. § 545

18 U.S.C. § 1001

**INFORMATION**

THE UNITED STATES ATTORNEY CHARGES:

**COUNT ONE**

**18 U.S.C. § 545 – Smuggling Goods into the United States**

On or about March 5, 2025, in the Eastern District of Michigan and elsewhere, the defendant, Chengxuan HAN, did knowingly and willfully, with the intent to defraud the United States, smuggle and clandestinely introduce, and attempt to smuggle and clandestinely introduce into the United States, merchandise, which should have been invoiced as biological material, that is, filter paper containing mammalian expression vectors, *i.e.* plasmids, all of which constitutes a violation of Title 18, United States Code, Section 545.

**COUNT TWO**

**18 U.S.C. § 545 – Smuggling Goods into the United States**

On or about September 29, 2024, in the Eastern District of Michigan and elsewhere, the defendant, Chengxuan HAN, did knowingly and willfully, with the intent to defraud the United States, smuggle and clandestinely introduce, and attempt to smuggle and clandestinely introduce into the United States, merchandise, which should have been invoiced as biological material, that is, petri dishes containing *C. elegans* with genetic modifications, all of which constitutes a violation of Title 18, United States Code, Section 545.

**COUNT THREE**

**18 U.S.C. § 545 – Smuggling Goods into the United States**

On or about September 23, 2024, in the Eastern District of Michigan and elsewhere, the defendant, Chengxuan HAN, did knowingly and willfully, with the intent to defraud the United States, smuggle and clandestinely introduce, and attempt to smuggle and clandestinely introduce into the United States, merchandise, which should have been invoiced as biological material, that is, filter paper containing a mammalian expression vector, *i.e.* a plasmid, all of which constitutes a violation of Title 18, United States Code, Section 545.

**COUNT FOUR**  
**18 U.S.C. § 1001 – False Statements**

On or about June 8, 2025, in the Eastern District of Michigan, the defendant, Chengxuan HAN, did knowingly and willfully make a materially false, fictitious, or fraudulent statement in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, all of which constitutes a violation of Title 18, United States Code, Section 1001(a)(2).

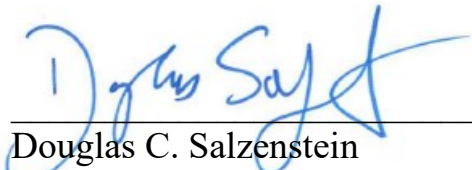
**FORFEITURE ALLEGATION**  
**18 U.S.C. § 982(a)(2)(B), 18 U.S.C. § 545 – Criminal Forfeiture**

Pursuant to Title 18, United States Code, Section 545, and Title 28, United States Code, Section 2461(c), the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any merchandise introduced into the United States in violation of Title 18, United States Code, Section 545, or the value thereof.

Pursuant to Title 18, United States Code, Section 982(a)(2)(B), the government will seek forfeiture of any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of violations of Title 18, United States Code, Section 545.

Pursuant to Title 28, United States Code, Section 2461(c), the government will seek forfeiture of substitute property up to the value of property subject to direct forfeiture that is not available for forfeiture on account of any act or omission contemplated by Title 21, United States Code, Section 853(p)(1).

JEROME F. GORGON, JR.  
United States Attorney



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Dated: June 26, 2025

United States District Court  
Eastern District of Michigan

## Criminal Case Cover Sheet

Case Number 2:25-cr-20479

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. Chengxuan Han

County where offense occurred : Wayne and Washtenaw

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.  
☐ Indictment/ ☒ Information --- based upon prior complaint [Case number: 25-mj-30370 ]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### Superseding Case Information

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

June 26, 2025  
Date

s/ Douglas c. Salzenstein  
 Douglas C. Salzenstein  
 Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.